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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE KAREN S. CRAWFORD)

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARIA DEL REFUGIO TAPIA,

Defendant.

Magistrate No. 13MJ2640-KSC
Criminal No. 13CR2809-MMA

UNOPPOSED REQUEST TO MODIFYING
CONDITIONS OF PRE-TRIAL RELEASE

The above-named Defendant, Maria del Refugio Tapia, by and through counsel, Bridget L. Kennedy, hereby request that the current conditions of pretrial release be modified to allow the defendant to periodically travel out of the district, at the discretion of Pre-Trial Services, between now and her self-surrender date of May 26, 2015. Ms. Tapia's trips out of the district will be to: Tijuana, Mexico; Mexicali, Mexico; and/or Riverside County, California. Ms. Tapia will be visiting her husband and siblings. Government counsel Stephen Miller and Pretrial Service Officer, Irene Pflaum, do not oppose to this request.

All other conditions shall remain as previously set by the Court.

Respectfully submitted,

Dated: April 21, 2015

s/ Bridget L. Kennedy
BRIDGET L. KENNEDY
Federal Defenders of San Diego, Inc.
Attorneys for Ms. Tapia

CERTIFICATE OF SERVICE

Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of her information and belief, and that a copy of the foregoing document has been served this day upon:

Steven Miller, Assistant United States Attorney

Efile.dkt.gc2@usdoj.gov

Irene Pflaum, United States Pretrial Service Officer

Respectfully submitted,

Dated: April 21, 2015

s/ Bridget L. Kennedy

BRIDGET L. KENNEDY

Federal Defenders of San Diego, Inc.